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Attorneys for Plaintiffs
The International Olympic Committee and
The United States Olympic Committee

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

The United States Olympic
Committee and The International
Olympic Committee,

Plaintiffs,

v.

Xclusive Leisure & Hospitality Ltd.;
Beijingticketing.com; 2008-
Olympics.com;
Beijingolympic2008tickets.com;
Beijingolympictickets2008.com;
Olympictickets.net;
Olympicticketsbeijing2008.com;
Does 1-10, inclusive,

Defendants.

Case No. C 08-03514 JSW

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**DECLARATION OF FEI LONG IN
SUPPORT OF PLAINTIFFS'
MOTION FOR A TEMPORARY
RESTRANING ORDER**

1 I, Fei Long, HEREBY DECLARE AS FOLLOWS:

2 1. I am a resident of Simi Valley, California. Except for the facts stated
3 on information and belief, all of facts set forth herein are known to me personally,
4 and if called as a witness, I could and would testify competently thereto.

5 2. In April of 2008, I was searching the Internet for available tickets to
6 the 2008 Olympic Closing Ceremony as well as the Men's Table Tennis Final. On
7 the first results page of my Google search, I found the Website
8 www.beijingticketing.com ("Beijing Ticketing"). The site claimed to sell tickets to
9 the 2008 Olympics. Attached as **Exhibit A** is a true and correct copy of the Beijing
10 Ticketing Website.

11 3. The Beijing Ticketing website contained several seemingly official
12 Olympic logos, such as the red human figure logo designed specifically for the
13 2008 Beijing Games, and appeared to me to be a source of legitimate tickets for the
14 2008 Olympics.

15 4. On April 25, 2008, I placed my order for two tickets to the Closing
16 Ceremony for \$950 each. I also placed an order for two tickets to the Men's Table
17 Tennis Final for \$325 each. I entered my contact information as well as my credit
18 card information in the spaces provided on the site. Beijing Ticketing did not ask
19 for, and I did not provide, my photograph or passport details.

20 5. On April 26, 2008, I received an email from Beijing Ticketing stating,
21 "Thanks for choosing our services to book your tickets online. We have received
22 the payment and your tickets will be dispatched within 2-4 four weeks prior to the
23 event date." The email indicated that the total for my order, which included a \$30
24 delivery fee, came to \$2,580. Attached as **Exhibit B** are true and correct copies of
25 the emails I received from Beijing Ticketing.

26 6. In an effort to verify exactly when my tickets would be delivered and
27 how I could expect delivery, I tried to contact Beijing Ticketing via telephone at
28

1 least ten times using the number listed on the website, however, no one ever
2 answered the line.

3 7. I also sent emails to sales@beijingticketing.com and tried to contact
4 Beijing Ticketing using the "Enquiry Form" on the website, however, I received no
5 response to any of my emails or online inquiries.

6 8. My credit card has been charged as a result of my order, however, at
7 this point, I have not nor do I expect to receive any tickets from Beijing Ticketing.

8 9. After learning from an online posting that Diana Torres represented
9 the United States Olympic Committee, I contacted Ms. Torres on the morning of
10 July 28, 2008 to discuss my experience with Beijing Ticketing and offer my help.
11 Prior to that date, I had never had any contact with Ms. Torres or anyone else
12 representing the plaintiffs in this matter.

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16 I declare under penalty of perjury under the laws of the United States that the
17 foregoing is true and correct.

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19 Executed on this 28th day of July, 2008 at Simi Valley, California.

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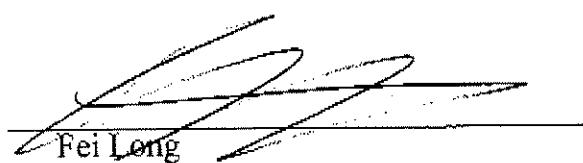
A handwritten signature in black ink, appearing to read "Fei Long", is written over a horizontal line.

EXHIBIT A

- [!\[\]\(756219e9389f679d57027482aa5cf5fc_img.jpg\) Google](#)
- [!\[\]\(fcb77b2d9531d23794a07d244b7a89bc_img.jpg\) Reddit](#)
- [!\[\]\(8175e06aff05874f50e11ffc448e6860_img.jpg\) Netscape](#)
- [!\[\]\(d7fb7ebced2c712ed3052caf75d30501_img.jpg\) Delicious](#)
- [!\[\]\(d0fe824e371dd316453cda01cf34ca98_img.jpg\) Yahoo](#)
- [!\[\]\(d1a2681fe7bfd4d9525bb4cc91a3e465_img.jpg\) Facebook](#)
- [!\[\]\(8b973f5add5af5083ee0afc186cd5414_img.jpg\) StumbleUpon](#)
- [!\[\]\(a60687ab372714f0e840dc74a221d5b2_img.jpg\) Ask](#)



Archery Competition
Sun, 10 Aug 08
Get the Best Archery Tickets
on the Locations The
Archery Competition In
Beijing National Stadium



Badminton Competition
Sat, 09 Aug 08
Get the Best Badminton
Tickets on the Locations on
The Badminton Competition
In Beijing University



Baseball Competition
Wed, 13 Aug 08
Get the Best Baseball
Tickets on the Locations
The Baseball Competition In
XingHub Workers Stadium

Login

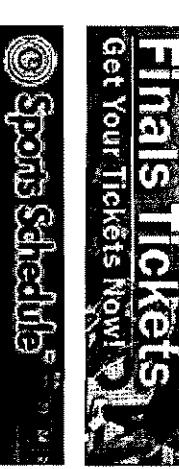
e-mail [Forgot Password](#)

[Login](#)

Closing Ceremony
Get Your Tickets Now!

Games :

- Archery Tickets
- Athletics Tickets
- Badminton Tickets
- Baseball Tickets
- Basketball Tickets
- Beach Volleyball Tickets
- Boxing Tickets
- Closing Ceremony Tickets
- Cycling BMX Tickets
- Cycling Mountain Bike Tickets
- Cycling Road Tickets
- Cycling Track Tickets
- Driving Tickets
- Equestrian Tickets
- Fencing Tickets
- Football Tickets
- Gymnastics Artistic Tickets
- Gymnastics Rhythmic Tickets
- Handball Tickets
- Hockey Tickets
- Judo Tickets
- Kayak Slalom Tickets
- Modern Pentathlon Tickets
- Opening Ceremony Tickets
- Rowing Tickets
- Sailing Tickets
- Shooting Tickets
- Softball Tickets
- Swimming Tickets
- Synchronised Swimming Tickets
- Table Tennis Tickets
- Taekwondo Tickets
- Tennis Tickets
- Triathlon Tickets
- Volleyball Tickets
- Water Polo Tickets
- Weightlifting Tickets



Hot Selling Olympic Summer Games:
BeijingTicketing is experienced ticket agent now selling Summer Olympic Tickets which is going to take place in China (Beijing , Quindao , Tianjin , Shanghai , Shenyang , Qinhuangdao , Hong Kong). Browse hundreds of tickets for all sessions of Men's and Women's sports of Olympic Summer Games, sorted by date and can be searched by sport, venue and dates.

Hot Selling Olympic Summer Games:

The Olympic Games is the longest run athletics competition in history, and Summer 2008 Olympics tickets are a passport to this rich world of tradition and ceremony. The 2008 Summer Olympics in Beijing, China , will be known as the Games of the XXIX Olympiad. The Olympics will be celebrated from August 8, 2008 to August 24, 2008. Buy tickets to Beijing Summer Olympic and see this awesome festival live! Popular games of Olympic are as follows.

- **Olympic Tickets: Opening Ceremony Beijing**
- **Olympic Tickets: Swimming Final Tickets Beijing**
- **Olympic Tickets: Tennis Singles & Final Tickets Beijing**
- **Olympic Tickets: Gymnastic Rhythmic Tickets Beijing**
- **Olympic Tickets: Closing Ceremony Beijing**

Ticketing Summary:

- BeijingTicketing reserve the rights to change timeline dates and prices.
- Ticketing information and event schedule are subject to change on this site.
- Buying Tickets from BeijingTicketing will protect your purchase from frauds.

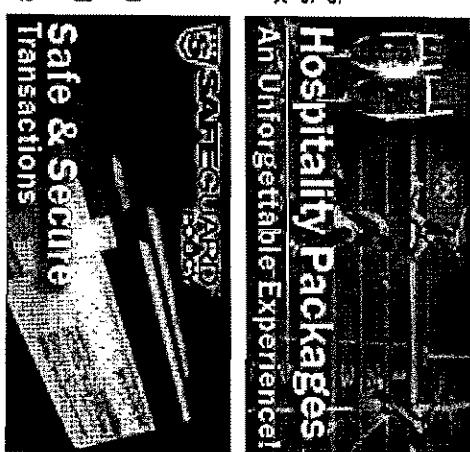
- We make sure that your Olympic Tickets are guaranteed and secure.
- Browse Event Calendar to find your tickets.
- Download printable, easy to use Event Schedule

Coming Up Next: Vancouver 2010 Winter Olympic Games

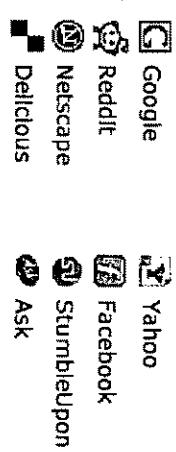
Pricing and ticket information for the Winter Games in Vancouver Canada are currently unavailable as it is not provided by Official Seller. BeijingTicketing is selling tickets for Summer Olympic Games Tickets and will sell tickets for all events at the Winter Games (Olympic 2010), so please check back with our site for up-to-date information, or register with us to get free updates on the Olympic Games.

Facts About Summer Olympic 2008

- BEIJING The head of ticket sales for the Olympics 2008
- The sale of 1.85 million tickets, available first-come first-served bases.
- Beijing was elected the host city on July 13 2001 during the 112th Session in Moscow, beating Toronto, Paris, Istanbul, and Osaka
- The centerpiece of the 2008 Summer Olympics will be the Beijing National Stadium, nicknamed the "Bird Nest" because of its nest -like skeletal structure.
- The Beijing municipal authority has declared that more than 70 local laws and decrees would be made before the 2008 Summer Olympics.
- The calendar for the 2008 Olympic Games is the most recent version of the games schedule.
- The Main Press Centre (MPC) is the central work place for the 5,600 accredited written and photographic press covering the 2008 Olympic Games.
- Media Service Guide for accredited media organizations for the Beijing 2008 Paralympic Games is released on the official website of BOCOG.



Safe & Secure
Transactions
Bookmark BeijingTicketing.com



- ▶ [Venues](#)
- ▶ [Beijing Institute of Technology Gymnasium](#)
- ▶ [Beijing Shooting Complex](#)
- ▶ [Beijing University of Aeronautics And Astronautics Gymnasium](#)
- ▶ [Beijing University of Technology Gymnasium](#)
- ▶ [Capital Indoor Stadium](#)
- ▶ [Chaoyang Park Beach Volleyball Ground](#)
- ▶ [China Agricultural University Gymnasium](#)
- ▶ [Fencing Hall](#)
- ▶ [Fengtai Softball Field](#)
- ▶ [Hong Kong Equestrian Venue \(Beas River\)](#)
- ▶ [Hong Kong Equestrian Venue \(Shatin\)](#)
- ▶ [Laoshan Bicycle Moto Cross \(BMX\) Venue](#)
- ▶ [Laoshan Mountain Bike Course](#)
- ▶ [Laoshan Velodrome](#)
- ▶ [Modern Pentathlon Venue](#)
- ▶ [National Aquatics Centre](#)
- ▶ [National Indoor Stadium](#)
- ▶ [National Stadium](#)
- ▶ [Olympic Green Archery Field](#)
- ▶ [Olympic Green Hockey Field](#)
- ▶ [Olympic Green Tennis Centre](#)
- ▶ [Olympic Sports Centre Gymnasium](#)
- ▶ [Peking University Gymnasium](#)
- ▶ [Qingdao Olympic Sailing Centre](#)
- ▶ [Qinhuangdao Olympic Sports Centre Stadium](#)
- ▶ [Shenyang Olympic Sports Centre Stadium](#)
- ▶ [Shunyi Olympic Rowing-Canoeing Park](#)
- ▶ [Tianjin Olympic Centre Stadium](#)
- ▶ [Triathlon Venue](#)
- ▶ [University of Science and Technology Beijing Gymnasium](#)
- ▶ [Cycling Road Course](#)
- ▶ [Workers Indoor Arena](#)
- ▶ [Workers Stadium](#)
- ▶ [Wukesong Baseball Field](#)
- ▶ [Wukesong Indoor Stadium](#)
- ▶ [Ying Tung Natatorium](#)

Beijing 2008 Ticketing is a well known tickets agent and a trusted market place for buyers to find book Olympic tickets. We assure 100 % guaranteed tickets delivery.

Olympic Summer Games - Olympic Finals - Olympic Semi Finals - Olympic Quarter Finals - Olympic Men's Sports - Olympic Women Sports - Olympic Venues



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[Privacy Policy](#) | Contact us at: sales@beijingticketing.com

[Olympic 2008 Schedule](#) [Olympic 2008 Request Tickets](#)



TESTED
17-JUL

Exhibit B

REDACTED

----- Forwarded message -----

From: sales@beijingticketing.com <sales@beijingticketing.com>
Date: 25 Apr 2008 17:50:55 +0100
Subject: Welcome to BeijingTicketing.com
To.
Cc: admin@beijingticketing.com

Welcome !

Dear Mr. Fei Long

Welcome to BeijingTicketing.com We are specialized in providing sold out Olympic Summer games tickets in very economical prices. Find your tickets from our secure and guaranteed website and book them as soon as possible. However if you cannot find your tickets here just give us a ring or drop an email anytime. We will be pleased to help you for finding your tickets.

Your login details are as follows:

URL: <http://www.beijingticketing.com/>
Login:
Password: XXXXXXXX

Featured Events



Sun, 10 Aug 08
[Get the Best Archery](#)



Sat, 09 Aug 08
[Get the Best Badminton](#)



Web, 13 Aug 08
[Get the Best Baseball](#)

Tickets on the Locations The Archery Competition In Beijing National Stadium	Tickets on the Locations The Badminton Competition In Beijing University	Tickets on the Locations The Baseball Competition In Wukesong Baseball Field
Games :		
Archery Tickets	Equestrian Tickets	Rowing Tickets
Athletics Tickets	Fencing Tickets	Sailing Tickets
Badminton Tickets	Football Tickets	Shooting Tickets
Baseball Tickets	Gymnastics Artistic Tickets	Softball Tickets
Basketball Tickets	Gymnastics Rhythmic Tickets	Swimming Tickets
Beach Volleyball Tickets	Gymnastics Trampoline Tickets	Synchronised Swimming Tickets
Boxing Tickets	Handball Tickets	Table Tennis Tickets
Closing Ceremony Tickets	Hockey Tickets	Taekwondo Tickets
Cycling BMX Tickets	Judo Tickets	Tennis Tickets
Cycling Mountain Bike Tickets	Kayak Flatwater Tickets	Triathlon Tickets
Cycling Road Tickets	Kayak Slalom Tickets	Volleyball Tickets
Cycling Track Tickets	Modern Pentathlon Tickets	Water Polo Tickets
Diving Tickets	Opening Ceremony Tickets	Weightlifting Tickets
Questions? Please feel free to contact www.BeijingTicketing.com team for any queries and further information.		
Ticket Search Helpline:	+44 (0) 207 593 2088	
Ticket Sales :	sales@beijingticketing.com	
General Information :	sales@beijingticketing.com	
	Home About Us Contact Us My Account Site Map Beijing Ticketing 2008 Inc. All rights reserved. <small>Terms and Conditions Contact us at: sales@beijingticketing.com</small>	

REDACTED

----- Forwarded message -----

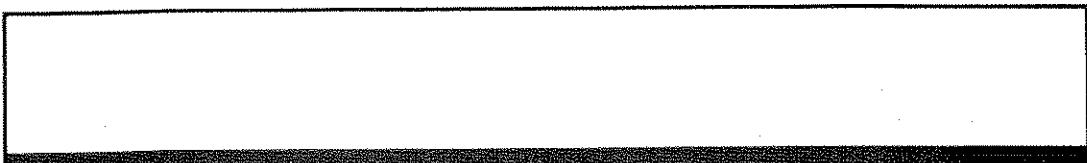
From: sales@beijingticketing.com <sales@beijingticketing.com>

Date: 26 Apr 2008 13:42:35 +0100

Subject: Your Payment Received.

To:

Cc: admin@beijingticketing.com

	
	
Dear Mr. Fei Long	
Thanks for choosing our services to book your tickets online. We have received the payment and your tickets will be dispatched within 2-4 four weeks prior to the event date.	
American Express Card Users:	
Please Note that orders with American Express cards will be charged in British Pounds (GBP) Currency. Currency conversion rates of the order date will be used in currency conversion. Please be advised that your credit card statement will show transaction in GBP (British Pounds) against this order. Please contact our sales team if you need any further assistance.	
Many Thanks	
Beijingticketing.com	
Order #:	30277
Order Date:	Saturday, April 26, 2008
Order Status:	Paid
Sport :	Closing Ceremony - (ZC01)
Date :	Sunday, August 24, 2008
Time :	20:00 - 23:00
Category:	Best Seating in venue
Venue :	National Stadium
Quantity :	2
Price :	\$950.00

City :	Beijing	Total :	\$1900.00
Session Details :	Closing Ceremony		
Sport :	Table Tennis - (TT29)		
Date :	Saturday, August 23, 2008		
Time :	19:30 - 21:30		
Category:	Best Seating in venue	Quantity :	2
Venue :	Peking University Gymnasium	Price :	\$325.00
City :	Beijing	Total :	\$650.00
Session Details :	Men's Singles Bronze Medal Match Men's Singles Gold Medal Match Men's Singles Medal Ceremony		
Sub Total :	\$2550.00		
Delivery Fee:	\$30.00		
Total :	\$2580.00		

Featured Events

		
 Sun, 10 Aug 08 Get the Best Archery Tickets on the Locations The Archery Competition In Beijing National Stadium	 Sat, 09 Aug 08 Get the Best Badminton Tickets on the Locations The Badminton Competition In Beijing University	 Web, 13 Aug 08 Get the Best Baseball Tickets on the Locations The Baseball Competition In Wukesong Baseball Field

Games :

Archery Tickets	Equestrian Tickets	Rowing Tickets
Athletics Tickets	Fencing Tickets	Sailing Tickets
Badminton Tickets	Football Tickets	Shooting Tickets
Baseball Tickets	Gymnastics Artistic Tickets	Softball Tickets
Basketball Tickets	Gymnastics Rhythmic Tickets	Swimming Tickets
Beach Volleyball Tickets	Gymnastics Trampoline Tickets	Synchronised Swimming Tickets
Boxing Tickets	Handball Tickets	Table Tennis Tickets
Closing Ceremony Tickets	Hockey Tickets	Taekwondo Tickets
Cycling BMX Tickets	Judo Tickets	Tennis Tickets
Cycling Mountain Bike Tickets	Kayak Flatwater Tickets	Triathlon Tickets
Cycling Road Tickets	Kayak Slalom Tickets	Volleyball Tickets
Cycling Track Tickets	Modern Pentathlon Tickets	Water Polo Tickets
Diving Tickets	Opening Ceremony Tickets	Weightlifting Tickets

Questions?

Please feel free to contact www.BeijingTicketing.com team for any queries and further information.

Ticket Search Helpline: +44 (0) 207 593 2088

Ticket Sales : sales@beijingticketing.com

General Information : sales@beijingticketing.com

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REDACTED

----- Forwarded message -----

From: Fei Long
Date: Jul 28, 2008 12:14 AM
Subject: Re: Your Order at BeijingTicketing 2008
To: sales@beijingticketing.com

Hi please answer my email or I'll dispute credit card. Thanks!

On Thu, Jun 12, 2008 at 11:24 PM, Fei Long <[wrote](#):
Hi can you let me know when will the tickets arrive?

Thanks!

Fei

----- Forwarded message -----

From: <sales@beijingticketing.com>
Date: Fri, Apr 25, 2008 at 10:39 PM
Subject: Your Order at BeijingTicketing 2008
To:
Cc: admin@beijingticketing.com

Dear Mr. Fei Long

Thank you for choosing BeijingTicketing as Olympic Tickets provider and booking tickets online.

Order #:	30277
Order Date:	Saturday, April 26, 2008
Order Status:	In Progress

Sport :	Closing Ceremony - (ZC01)	Quantity :	2
Date :	Sunday, August 24, 2008	Price :	\$950.00
Time :	20:00 - 23:00	Total :	\$1900.00
Category:	Best Seating in venue		
Venue :	National Stadium		
City :	Beijing		
Session	Closing Ceremony		
Details :			
Sport :	Table Tennis - (TT29)	Quantity :	2
Date :	Saturday, August 23, 2008	Price :	\$325.00
Time :	19:30 - 21:30	Total :	\$650.00
Category:	Best Seating in venue		
Venue :	Peking University Gymnasium		
City :	Beijing		
Session	Men's Singles Bronze Medal Match		
Details :	Men's Singles Gold Medal Match		
Sub Total :	\$2550.00		
Delivery Fee:	\$30.00		
Total :	\$2580.00		

Your Order is InProcess now. As soon as we successfully process your Credit/Debit card you will get an Order confirmation email.

Featured Events

	Sun, 10 Aug 08 Get the Best Archery Tickets on the Locations The Archery Competition In Beijing National Stadium		Sat, 09 Aug 08 Get the Best Badminton Tickets on the Locations The Badminton Competition In Beijing University		Web, 13 Aug 08 Get the Best Baseball Tickets on the Locations The Baseball Competition In Wukesong Baseball Field
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Games :

Archery Tickets	Equestrian Tickets	Rowing Tickets
Athletics Tickets	Fencing Tickets	Sailing Tickets
Badminton Tickets	Football Tickets	Shooting Tickets
Baseball Tickets	Gymnastics Artistic Tickets	Softball Tickets
Basketball Tickets	Gymnastics Rhythmic Tickets	Swimming Tickets
Beach Volleyball Tickets	Gymnastics Trampoline Tickets	Synchronised Swimming Tickets
Boxing Tickets	Handball Tickets	Table Tennis Tickets
Closing Ceremony Tickets	Hockey Tickets	Taekwondo Tickets
Cycling BMX Tickets	Judo Tickets	Tennis Tickets
Cycling Mountain Bike Tickets	Kayak Flatwater Tickets	Triathlon Tickets
Cycling Road Tickets	Kayak Slalom Tickets	Volleyball Tickets

Cycling Track Tickets	Modern Pentathlon Tickets	Water Polo Tickets
Diving Tickets	Opening Ceremony Tickets	Weightlifting Tickets

Questions?
Please feel free to contact www.BeijingTicketing.com team for any queries and further information.

Ticket Search Helpline:	+44 (0) 207 593 2088
Ticket Sales :	sales@beijingticketing.com
General Information :	sales@beijingticketing.com

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